

INTERNATIONAL MILITARY TRIBUNAL
FOR THE FAR EAST

-1-

THE UNITED STATES OF AMERICA, et al
vs
ARAKI, Sadao, et al

Rec'd Mr
9/15
(i)
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- Defendants -

REQUEST FOR PRODUCTION OF WITNESSES

A. NOW COMES ARAKI, Sadao and requests the Tribunal, in accordance with Section III, Article 9 (e) of the Charter, to order the production of the following witnesses necessary for his defense:

- (1) KOMURA, Sakahiko;
 - (a) The nationality of the witness is Japanese;
 - (b) He is presently in Tokyo and is a government official in the Home Office;
- (2) FUTAARA, Yoshinori;
 - (a) The nationality of the witness is Japanese;
 - (b) He is presently in Tokyo and is a member of the Upper House;
- (3) KITA, Reikichi;
 - (a) The nationality of the witness is Japanese;
 - (b) He is presently in Tokyo and is a member of the Lower House;
- (4) YASUI, Eiji;
 - (a) The nationality of the witness is Japanese and an ex-Education Minister;
 - (b) This witness may be located in Kanagawa Prefecture;
- (5) SAWADA, (Mrs.) Renzo;
 - (a) The nationality of the witness is Japanese and the wife of the ex-Ambassador SAWADA;
 - (b) This witness may be located in Kanagawa Prefecture;
- (6) HATOYAMA, Ichiro;
 - (a) The nationality of the witness is Japanese and an

ex-Education Minister;

(b) This witness may be located in Tokyo.

(7) MITSUCHI, Chuzo;

(a) The nationality of the witness is Japanese and an ex-Railway Minister;

(b) This witness may be located in Tokyo;

(8) YAMAOKA, Juko;

(a) The nationality of the witness is Japanese and an ex-Lieutenant General;

(b) This witness may be located in Eihimi Prefecture;

(9) MURAKAMI, Keisaki;

(a) The nationality of the witness is Japanese and an ex-Lieutenant General;

(b) This witness was in Manchuria at the end of the war and is now believed to be a prisoner of war of the Soviet Union;

(10) MUDAGUCHI, Renya;

(a) The nationality of the witness is Japanese and an ex-Lieutenant General;

(b) This witness is believed to be in Singapore, having been sent there from Tokyo in September by the Allies;

(11) MAZAKI, Jinsaburo;

(a) The nationality of the witness is Japanese and an ex-General;

(b) This witness may be located in Sugamo Prison, Tokyo;

(12) HORIKIRI, Zenjiro;

(a) The nationality of the witness is Japanese and an ex-Chief of the Cabinet Secretariat;

(b) This witness may be located in Tokyo;

(13) ARIYOSHI, Chuichi;
(a) The nationality of the witness is Japanese and an ex-Ambassador to China;
(b) This witness may be located in Tokyo;

(14) UEDA, Kenkichi;
(a) The nationality of the witness is Japanese and an ex-General;
(b) This witness may be located in Tokyo;

(15) HANEDA, Toru;
(a) The nationality of the witness is Japanese and an ex-President, Kyoto Imperial University;
(b) The witness may be located in Kyoto;

(16) YONAI, Mitsumasa;
(a) The nationality of the witness is Japanese and an ex-Premier;
(b) This witness may be located in Tokyo;

(17) KANAMORI, Tokujiro;
(a) The nationality of the witness is Japanese and Minister of State;
(b) This witness may be located in Tokyo;

(18) HUNT, Frazier;
(a) The nationality of the witness is American and a journalist;
(b) This witness was a special correspondent for the International News Service in Japan during the year 1932 and is believed to be at present in the United States of America;

(19) PIGGOT, Major General;
(a) The nationality of the witness is British and is an ex-Military Attaché to the British Embassy in Japan;

- (b) This witness may be located in London;
- (20) LINDLEY, ex-Ambassador;
 - (a) The nationality of the witness is British and is an ex-British Ambassador to Japan;
 - (b) This witness can be located in England;
- (21) IKEZAKI, Tadataka;
 - (a) The nationality of the witness is Japanese and an ex-Parliamentary Councillor of the Education Office;
 - (b) This witness can be located in Sugamo Prision, Tokyo;
- (22) MIZUNO, Shinko;
 - (a) The nationality of the witness is Japanese and is Chief of the Movie Section of the Tokyo Mainichi Newspaper;
 - (b) This witness may be located in Tokyo;
- (23) KINOSHITA, Takeshi;
 - (a) The nationality of the witness is Japanese and is President of the Kagoshima Newspaper;
 - (b) This witness may be located in Kagoshima Prefecture;
- (24) RYU, Kuratsugu;
 - (a) The nationality of the witness is Japanese and is an ex-Major General;
 - (b) This witness may be located at the Kumamoto Prefecture;
- (25) TAKAGI, Rikuro;
 - (a) The nationality of the witness is Japanese and is a business man;
 - (b) This witness may be located in Tokyo;
- (26) BYAS, Hugh;
 - (a) The nationality of the witness is British and was Staff Correspondent in Japan of the "Times" of London and New York during the year 1931;

	(b) This witness may be located in London, England;	
(27) KOYAMA, Matsukichi;		
	(a) Minister of Justice, Tokyo;	
B.	The defendant ARAKI further requests the Tribunal, in accordance with Section III, Article 9 (e) of the Charter, to order the production of the following documents necessary for his defense:	
	<u>DOCUMENT</u> <u>LOCATION</u>	
1.	Stenographic Record of main Session of Privy Council on January 30, 1932	Privy Council Office
2.	Stenographic Record of 60th Session of Diet (Upper House)	Upper House Office
3.	Stenographic Record of 61st Session of Diet (Upper House)	Upper House Office
4.	Stenographic Record of 62nd Session of Diet (Upper House)	Upper House Office
5.	Stenographic Record of 63rd Session of Diet (Upper House)	Upper House Office
6.	Stenographic Record of 64th Session of Diet (Upper House)	Upper House Office
7.	Stenographic Record of 74th Session of Diet (Upper House)	Upper House Office
8.	Stenographic Record of 62nd Session of Diet (Lower House)	Lower House Office
9.	Copy of New York Times, Mar. 12, 1933, containing the article, "Man of Affairs in Japan."	New York City
10.	Copy of Hugh Byas' broadcast of Dec. 2, 1931 on the Manchurian problem;	Broadcasting Station, JOAK, Tokyo
11.	Copy of Frazier Hunt's broadcast of June 2, 1932 entitled "Japan in Transition."	Broadcasting Station JOAK, Tokyo
12.	Copy of Hugh Byas' interview with General ARAKI on June 16, 1932 concerning China and Manchuria;	London and/or New York Times
13.	Copy of any article which appeared in the New York or London Times as a result of Hugh Byas' interview with General ARAKI on January 16, 1932;	London and/or New York Times

14. Stenographic Record of the Upper House on January 31, 1939; Upper House Office

15. Stenographic Record of the Upper House on February 19, 1939; Upper House Office

16. Stenographic Record of the Upper House on March 7, 1939. Upper House Office

C. The facts to be proved by these witnesses and documents are the policies, utterances, actions and intent of the accused ARAKI during the time in which he is charged by the Indictment;

D. The relevance of the testimony of these witnesses, all of whom were associated with the accused ARAKI in various capacities during the time charged in the Indictment is, in its tendency to establish that the accused ARAKI took no part in any of the conspiracies charged to him; and was not in any way connected with the planning, initiating or waging of wars of aggression; and was, furthermore, in no way connected with the commission of any crimes against peace;

E. The date upon which attendance of the witnesses will be required for testifying cannot at this time be stated accurately but their attendance for consultation with defense counsel is required forthwith.

ARAKI, Sadao

By

SUGAHARA, Yataka

Lawrence J. McManus